

EDWIN H. BEACHLER
DANIEL K. BRIDMONT
WILLIAM R. CAROSELLI
RHETT P. CHURCH
CRAG E. COLEMAN*
TIMOTHY CONBOY
LOTTA CRANFEE
KELLY L. ENDERS
KEVIN W. LEE



CAROSELLI BEACHLER McTIERNAN & CONBOY LLC
312 BOULEVARD OF THE ALLEES • EIGHTH FLOOR
PITTSBURGH, PENNSYLVANIA 15222-1916
412-391-9860 • 1-800-222-8816 • FAX 412-391-7453
E-MAIL: INFO@CNCMLAW.COM

DAVID A. MCGOWAN**
JOHN W. McTIERNAN
JOANNA P. PARAZZOS
MELISSA L. RUFFLE
THOMAS G. SMITH
FRED C. SOLES

OF COUNSEL
CATHERINE A. BAXTER
SUSAN A. MEREDITH

* ADMITTED IN PA, NJ & WV
** ADMITTED IN PA & OH

August 1, 2006

File No. 231009

VIA: First Class US Mail, and Certified US Mail
No. 7160 3901 9848 1785 6610

MUR # 5783

To:

Lawrence H. Norton, Esq.
Federal Election Commission
999 E Street, NW
Washington, DC 20463

In Re: *Caroselli v. Santorum Victory Committee, et al.*
Before the Federal Election Commission

Dear Mr. Norton:

Enclosed for filing is the original Complaint in the above captioned matter.

If you have any questions, please call.

Very Truly Yours,

William R. Caroselli

WRC/sjh
Enclosure: (1) Complaint

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
1700 AUG -2 A 10:26

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**BEFORE THE
FEDERAL ELECTION COMMISSION**

William Caroselli,

Complainant,

v.

**Carl Romanelli,
308 Spring Street
Hanover Twp., PA 16708;**

**Carl Romanelli for U.S. Senate
308 Spring Street
Hanover Twp., PA 16708; and**

**Green Party of Luzerne County, PA
308 Spring Street
Hanover Twp., PA 16708,**

Respondents.

MUR No. _____

COMPLAINT

Complainant files this complaint against Carl Romanelli; Carl Romanelli for U.S. Senate; and the Green Party of Luzerne County, PA (collectively, "Respondents"), for violations of the Federal Election Campaign Act and Federal Election Commission regulations, as described below.

I. FACTS

Respondent Green Party of Luzerne County, PA ("Green Party") registered with the Commission on May 24, 2006. It registered as a nonconnected political committee; it did not register as a political party committee. It has not yet qualified for multicandidate status.

On June 30, 2006, the Green Party reported receiving \$66,000 in receipts for the quarter. It reported an identical amount of disbursements – \$66,000 – all listed on line 29 as "Other Disbursements." Each and every disbursement was listed with a purpose of "Ballot

Qualification" for Carl Romanelli for U.S. Senate. No disbursements were listed on either line 23 (contributions to federal candidates) or on line 25 (coordinated party expenditures under 2 U.S.C. § 441a(d)). The Green Party listed no other disbursements of any kind.

On July 18, 2006, Carl Romanelli for U.S. Senate filed its quarterly report electronically. It did not file a paper copy with the Commission. On line 11c (contributions from other political committees), it listed receiving \$66,000 in in-kind contributions from the Green Party, as in-kind contributions.

II. ARGUMENT

A. Legal Background

A nonconnected political committee may contribute only up to \$2,100 per election to federal candidates. 11 C.F.R. § 110.1(b)(1). A multicandidate committee may contribute only up to \$5,000 per election to federal candidates. *Id.* § 110.2(b)(1).

To qualify as a multicandidate committee, a committee must have been in existence for six months, received contributions from more than 50 persons, and made contributions to five or more candidates. *Id.* § 100.5(e)(3).

Federal contributions may not be made by a person in the name of another, or accepted if made by one person in the name of another. *Id.* § 110.4. Earmarked contributions made from a contributor through an intermediary to a candidate are considered to be contributions from that person to the candidate. *Id.* § 110.6(a).

B. Application to Facts

The Green Party has registered as a nonconnected political committee. It has not attempted to take advantage of political party status or the right to make coordinated party expenditures. As a political committee that has not yet qualified for multicandidate status, the Green Party is limited to contributions of \$2,100 per election. Its in-kind contributions of \$66,000 to the Rominelli campaign far exceed those limits. Rominelli has similarly accepted in-kind contributions from the Green Party far in excess of those permitted by federal law.

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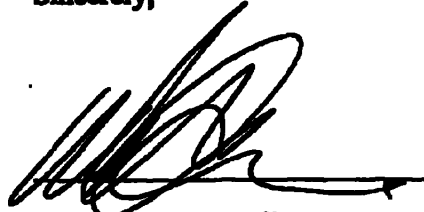
Worse still, the Green Party appears to have been created and operated entirely as a way to funnel contributions into the Rominelli campaign. Of its twenty contributors, twelve have given more than the \$2,100 they could have given if they had donated directly to the Romanelli campaign. And because the Green party has made no other disbursements other than contributions to Romanelli, all of the contributions to the Green Party should be considered earmarked contributions to the Romanelli campaign.

III. CONCLUSION

As I have shown, Respondents have violated the Federal Election Campaign Act. Accordingly, I request that they be enjoined from further violations, be required to repay their illegal contributions and be fined the maximum amount permitted by law.

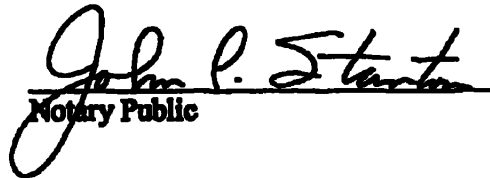
29044253459

Sincerely,



William R. Caroselli

SUBSCRIBED AND SWORN to before me this 1ST day of August, 2006.


Notary Public

My Commission Expires:

Notarial Seal
John C. Stanton, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires Apr. 15, 2007
Member, Pennsylvania Association Of Notaries